

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Leemanuel Welch v. Safari Restaurant Bar, et al.

Weilch · No. SA CV 25-2858 PA (DFMx) · Decided January 6, 2026

SUMMARY

The United States District Court for the Central District of California ordered the plaintiff to show cause why the court should exercise supplemental jurisdiction over claims under California's Unruh Civil Rights Act and any other state-law claims. The court also required the plaintiff to identify the statutory damages sought and required the plaintiff and counsel to submit declarations addressing whether they qualify as high-frequency litigants under California law. A response was due by January 20, 2026, with failure to respond potentially resulting in dismissal without prejudice or declining supplemental jurisdiction.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	Percy Anderson
JURISDICTION	United States District Court for the Central District of California
DECIDED	January 6, 2026
DOCKET	SA CV 25-2858 PA (DFMx)
DISPOSITION	other
PROCEDURAL POSTURE	The court issued an order to show cause requiring plaintiff to explain why the court should exercise supplemental jurisdiction over the Unruh Civil Rights Act claim and any other state-law claims.
STANDARD OF REVIEW	The court must consider and weigh judicial economy, convenience, fairness, and comity when deciding whether to exercise supplemental jurisdiction, and may decline supplemental jurisdiction under 28 U.S.C. § 1367(c).
PRECEDENTIAL VALUE	Unpublished district court order; precedential status not stated in the opinion.

TOPICS

- subject matter jurisdiction
- civil procedure
- public accommodations discrimination
- ada / disability

PRACTICE AREAS

civil procedure

Americans with Disabilities Act

supplemental jurisdiction

California Unruh Civil Rights Act

QUESTIONS PRESENTED

1. Whether plaintiff must show cause why the court should exercise supplemental jurisdiction over the Unruh Civil Rights Act claim and any other state-law claims.
2. What information plaintiff and counsel must provide to permit the court to evaluate the requested statutory damages and whether they qualify as high-frequency litigants under California Code of Civil Procedure § 425.55(b)(1) and (2).

HOLDINGS

1. The court ordered plaintiff to show cause in writing why the court should exercise supplemental jurisdiction over the Unruh Civil Rights Act claim and any other state-law claim asserted in the complaint.
2. The court required plaintiff to identify the amount of statutory damages sought and required plaintiff and counsel to submit declarations under penalty of perjury containing facts necessary to determine whether they satisfy California's definition of a high-frequency litigant.

KEY QUOTATIONS

“The supplemental jurisdiction statute “reflects the understanding that, when deciding whether to exercise supplemental jurisdiction, ‘a federal court should consider and weigh in each case, and at every stage of the litigation, the values of judicial economy, convenience, fairness, and comity.’””

FACTUAL BACKGROUND

The complaint alleges a violation of the Americans with Disabilities Act and seeks injunctive relief. It also asserts a claim for damages under California's Unruh Civil Rights Act and potentially other state-law claims.

PROCEDURAL HISTORY

Plaintiff filed a complaint asserting a claim for injunctive relief under the Americans with Disabilities Act and a damages claim under California's Unruh Civil Rights Act. The court sua sponte ordered plaintiff to respond by January 20, 2026, identifying the statutory damages sought and submitting declarations concerning whether plaintiff and counsel qualify as high-frequency litigants.

DISPOSITION

other

CASES CITED

- City of Chicago v. International College of Surgeons, 522 U.S. 156, 173, 118 S. Ct. 523, 534, 139 L. Ed. 2d 525 (1997)

- *Carnegie-Mellon University v. Cohill*, 484 U.S. 343, 350, 108 S. Ct. 614, 619, 98 L. Ed. 2d 720 (1988)

OPINION

Leemanuel Welch v. Safari Restaurant Bar, et al.

PER CURIAM.

CENTRAL DISTRICT OF CALIFORNIA

CIVIL MINUTES - GENERAL

Case No. SA CV 25-2858 PA (DFMx) Date January 6, 2026 Title Leemanuel Welch v. Safari Restaurant Bar, et al. Present: The Honorable PERCY ANDERSON, UNITED STATES DISTRICT JUDGE Kamilla Sali-Suleyman Not Reported Deputy Clerk Court Reporter / Recorder Attorneys Present for Plaintiffs: Attorneys Present for Defendants: None None Proceedings: IN CHAMBERS — ORDER TO SHOW CAUSE The Complaint filed in this action asserts a claim for injunctive relief arising out of an alleged violation of the Americans with Disabilities Act (“ADA”), 42 U.S.C. §§ 12010-12213, and a claim for damages pursuant to California’s Unruh Civil Rights Act (“Unruh Act”), Cal. Civ. Code §§ 51-53. It appears that the Court possesses only supplemental jurisdiction over the Unruh Act claim, and any other state law claim that plaintiff may have alleged, pursuant to the Court’s supplemental jurisdiction. See 28 U.S.C. § 1367(a). The supplemental jurisdiction statute “reflects the understanding that, when deciding whether to exercise supplemental jurisdiction, ‘a federal court should consider and weigh in each case, and at every stage of the litigation, the values of judicial economy, convenience, fairness, and comity.’” *City of Chicago v. Int’l Coll. of Surgeons*, 522 U.S. 156, 173, 118 S. Ct. 523, 534, 139 L. Ed. 2d 525 (1997) (emphasis added) (quoting *Carnegie-Mellon Univ. v. Cohill*, 484 U.S. 343, 350, 108 S. Ct. 614, 619, 98 L. Ed. 2d 720 (1988)). The Court therefore orders plaintiff to show cause in writing why the Court should exercise supplemental jurisdiction over the Unruh Act claim and any other state law claim asserted in the Complaint. See 28 U.S.C. § 1367(c). In responding to this Order to Show Cause, plaintiff shall identify the amount of statutory damages plaintiff seeks to recover. Plaintiff and plaintiff’s counsel shall also support their responses to the Order to Show Cause with declarations, signed under penalty of perjury, providing all facts necessary for the Court to determine if they satisfy the definition of a “high-frequency litigant” as provided by California Civil Procedure Code sections 425.55(b)(1) & (2). Plaintiff shall file a Response to this Order to Show Cause by no later than January 20, 2026. Failure to timely or adequately respond to this Order to Show Cause may, without further warning, result in the dismissal of the entire action without prejudice or the Court declining to exercise supplemental jurisdiction over the Unruh Act and other state law claims, if any, and the dismissal of any such claims pursuant to 28 U.S.C. § 1367(c).